

X 7-13-2019

DATE

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JUL 09 2019

U.S. District Court  
Middle District of TN

I have received and read the Diabetic Judgement Order  
(Case number 3:17-cv-0048).

X Michael A. Campbell #21566

SIGN and TDOC NUMBER

NOTICE TO CLASS MEMBERS  
OF PROPOSED SETTLEMENT JUDGMENT  
FROM THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

ATTENTION ALL INMATES PLACED AT THE  
TROUSDALE TURNER CORRECTIONAL CENTER

This notice sets forth the basic terms of the proposed settlement reached in the class action lawsuit *Dodson, et al. v. CoreCivic, Inc., et al.*, Case No. 3:17-CV-48, which is set forth in the attached proposed Judgment (hereinafter "Judgment"), and advises class members of their procedural rights relating to the proposed Judgment. The settlement class in this lawsuit has been defined as the following:

All inmates with Type I and insulin-dependent Type II diabetes who are or may become housed at the Trousdale Turner Correctional Center (hereinafter "Trousdale") and who require access to blood sugar checks and insulin administration in coordination with regular mealtimes.

DESCRIPTION OF THE CLASS ACTION

The plaintiffs filed this civil rights class action lawsuit in January 2017 seeking declaratory and injunctive relief and alleging that the defendants have deprived, and continue to deprive, inmates with insulin-dependent diabetes of access to basic diabetes care at Trousdale. The plaintiffs previously were incarcerated at Trousdale. The plaintiffs sought class certification, an award of attorneys' fees and expenses, and declaratory and injunctive relief, which included a request that insulin-dependent inmates be provided with access to blood sugar checks and insulin administration in coordination with regular mealtimes. The defendants have denied these allegations. The parties participated in extended negotiations. The proposed Judgment is the result of those negotiations and represents the understanding of the parties about CoreCivic's protocol for providing insulin-dependent inmates with access to blood sugar checks and insulin administration in coordination with regular mealtimes, as well as adding corresponding language to CoreCivic's written policies and training materials.

DESCRIPTION OF THE PROPOSED JUDGMENT

The proposed Judgment requires that insulin-dependent inmates will be provided with access to blood sugar checks and insulin administration in coordination with regular mealtimes. Most of the terms of the proposed Judgment are described below. Because the proposed Judgment contains many detailed provisions and is several pages in length, not all of the provisions can be described in this Notice. Therefore, the proposed Judgment is attached to this Notice. If the proposed Judgment is not attached to this Notice, copies of the proposed Judgment are being placed in the library at Trousdale to permit class members to read the document in its entirety.

The description of the proposed Judgment that follows is for the purpose of informing class members about the contents of the proposed Judgment. However, the language of the proposed Judgment, rather than the language of this Notice, will be binding on the parties. In light of this, interested class members should read the entire proposed Judgment.

Under the terms of the proposed Judgment, CoreCivic has established and implemented protocol to provide access to blood sugar checks and insulin administration in coordination with regular mealtimes. CoreCivic will continue with such protocol unless it determines that a different protocol is appropriate.

Additionally, CoreCivic will add language to its written policies and training materials at Trousdale to ensure insulin-dependent inmates' access to blood sugar checks and insulin administration in coordination with regular mealtimes. CoreCivic will remain subject to the terms of the proposed Judgment for two years after the proposed Judgment is approved by the Court.

Attorneys' fees and expenses for the plaintiffs' attorneys are subject to approval by the Court and will be paid by CoreCivic. CoreCivic has agreed to pay, at most, \$99,950.00 in full satisfaction of any and all claims that counsel for the plaintiffs could have sought for an award of attorney's fees and expenses in this matter under any theory of recovery.

THIS IS NOT A DAMAGES CLASS ACTION

This action was settled only for injunctive relief. The proposed Judgment contains a release of claims by the class members relating to any and all claims for injunctive relief regarding access to blood sugar checks and insulin administration in coordination with regular mealtimes that were asserted or that could have been asserted against CoreCivic and a stipulated dismissal of Defendants Tennessee Department of Correction and Commissioner Tony Parker.

HOW TO OBTAIN FURTHER INFORMATION

This Notice only contains a summary of the proposed Judgment. The terms are set forth in greater detail in the proposed Judgment, which is attached and is available for review in the Trousdale library.

FINAL APPROVAL HEARING AND OBJECTION  
PROCEDURE

The hearing for the final approval of the proposed Judgment has been scheduled for July 25, 2019, at 10 a.m. before Eli Richardson, United States District Court for the Middle District of Tennessee, 801 Broadway, Room 800, Nashville, Tennessee 37203.

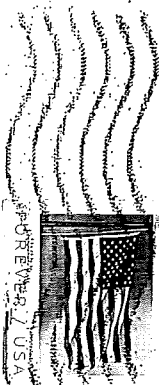
Class members who wish to object to the proposed Judgment should file written objections with the Court stating their name, inmate number, and address and indicating the basis for their objection to the proposed Judgment no later than fourteen days before the hearing for the final approval of the proposed Judgment, by mailing objections to the Clerk of Court at the Court's address in the previous paragraph.

ISSUED AT THE DIRECTION OF THE COURT

EXHIBIT B

MICHAEL A. CAMPBELL #121566  
140 MACON WAY  
HARTSVILLE, TENNESSEE 37074

HARTSVILLE TN 370  
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UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
801 BROADWAY, ROOM 800.

37203 Nashville, Tennessee 37203